

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA

UNITED STATES OF AMERICA

v.

JOHN ROUSE

CRIMINAL COMPLAINT

CASE NUMBER: 4:10-MJ 119 -GMF

I, the undersigned complainant being duly sworn states the following is true and correct to the best of my knowledge and belief. On or about May 24, 2010, in the Columbus Division of the Middle District of Georgia, John Rouse, defendant herein, did transmit in interstate commerce a communication containing a threat to injure the person of another; all in violation of Title 18, United States Code, Section 875(c)..

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No

SA Gordon Hurley - FBI
Signature of Complainant
S/A Gordon Hurley

Sworn to before me and subscribed in my presence,

May 27, 2010 2:05 p.m. at
Date

Columbus, Georgia
City and State

Mallon Faircloth, United States Magistrate
Name & Title of Judicial Officer

[Signature]
Signature of Judicial Officer

AFFIDAVIT

1. Affiant, after being duly sworn, swears and affirms that he is a Special Agent of the Federal Bureau of Investigation and has served as such for over twenty-three (23) years. Affiant investigates violations of Federal law, including violations of Title 18, section 875. Affiant has conducted an investigation which included interviews of witnesses, record reviews and a review of a recorded conversation between the defendant and a witness. Based upon the above, Affiant advises as follows:
2. On May 24th, 2010, Affiant interviewed Maria Carter, Customer Service Representative (CSR) of the American Family Life Assurance Company (AFLAC), Columbus, Georgia., who advised as follows: Carter was working as a CSR on the afternoon of May 24th, 2010, when she received a telephone call from an AFLAC customer regarding a claim. Carter noted that when individuals call in for assistance, the AFLAC computer based telephone system requires customers to provide certain personal information to verify their identity. If a customer does not provide/verify the information the CSR is automatically notified. Regarding this particular telephone call, Carter determined that the appropriate verifications were correctly completed. Carter's computer screen displayed information identifying the caller/customer as: John Rouse, home address: 13848 Hollowgreen Drive, Houston, Texas, 77082, with a date of birth of August 26th, 1948 and a contact telephone number of (713) 492-1967. At the outset of the telephone call, Carter verbally confirmed that she was speaking to "John Rouse". During this telephone call, Rouse complained that he was unhappy about the service he had received from AFLAC regarding a pending claim. Eventually, Rouse demanded that his claim be handled within the next day or he would bring a "shotgun" to AFLAC. Carter cautioned Rouse about such a comment and Rouse then reiterated the comment and also stated that he was serious. Rouse then asked Carter words to the effect: "what if I bring a bomb down there?" and "how about I fly a plane into your building." Carter then placed Rouse on hold and transferred the call to CSR Supervisor Sharon Morton. This telephone call was recorded in its entirety.
3. On May 25th, 2010, Affiant interviewed AFLAC CSR Supervisor Sharon Morton who advised as follows: On May 24th, 2010, she was requested by CSR Maria Carter to assist in a telephone call from a customer. This telephone call was transferred to Morton and she was able to determine that the policyholder was a "John Rouse." During this telephone call Rouse told Supervisor Morton that if his claim was not settled by the next day, that he "would come packing." Morton took this statement as a threat. Also during this telephone call, Rouse provided Morton with telephone number (713) 492-1967, as a

point of contact. Shortly thereafter, this telephone call was terminated. This portion of the telephone contact was not recorded.

4. On May 25th, 2010, Affiant received and reviewed a recorded copy of the telephone call in this matter. Affiant confirmed the above threats were captured on this recording, including statements regarding: coming to AFLAC with a "shotgun" if this claim was not settled by the next day; a subsequent bomb threat and also "fly a plane into your building".
5. On May 24th, 2010, Lieutenant William Rawn, Columbus Police Department Investigative Services Division conducted a public source record check regarding "John Rouse" and determined that Texas drivers license number 01391310 was issued to John Vincent Rouse, 13848 Hollowgreen Drive, Houston, Texas. This record check also revealed multiple vehicles registered with the State of Texas to "John Rouse" at 13848 Hollowgreen Drive, Houston, Texas. A further review of this information also found deed information that "John Rouse" is the owner of record of the property at 13848 Hollowgreen Drive, Houston, Texas.
6. Based upon the above, Affiant believes that there is probable cause to believe that John Rouse has committed the crime of extortion by conveying a threat to harm or injure another via an interstate communication device, in violation of Title 18, Section 875.

Sworn to and subscribed on this the 27th of May, 2010

SA Gordon H. Hurley, Jr. - FBI

Special Agent Gordon H. Hurley, Jr.

Federal Bureau of Investigation-Columbus, Georgia

G. Mallon Faircloth

G. Mallon Faircloth

United States Magistrate-Columbus, Georgia